REMARKS

Claims 1-50 are currently pending in the application. No new matter has been added.

I.   CLAIM REJECTIONS UNDER 35 U.S.C. § 102

Claims 1, 13, 37, 45, and 46

Claim 1, 13, 37, 45, and 46 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S.

Patent No. 6,832,219 issued to Lal et al. (Lal).

For claim 1, there are one or more claimed limitations that are not disclosed, taught or

suggested by the cited references. Claim 1 recites the following limitations:

assigning a document identifier to an XML document;

parsing the XML document to identify a node;

for the identified node in the XML document:

storing a path ~~information~~ for the node;

storing hierarchical information for the node; and

storing node data for the node.

1.   Amended claim 1 recites "storing a path for a node." According to the Office Action,

column 3, lines 62-67, column 4, lines 1-25, column 5, lines 38-67, and column 6, lines 1-40 of Lal

allegedly disclose storing path information for the node. Applicants respectfully submit that Lal

does not teach or suggest storing a path for a node.

Lal is directed toward storing data from an Extensible Markup Language (XML) document

in a relational database according to the markup type. (Lal, Abstract and col. 4, lines 10-25). Lal

discloses parsing an XML document and storing the data into a set of markup tables, one markup

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table for each type. (Lal, col. 4, lines 10-25). Lal specifically teaches the storage in the database for each node including: storage of the id of the parent node, the id of the node being stored, the element name, and the value represented by the node in the markup table for the node type. (Lal, col. 6, lines 11-25). Lal specifically provides storage plan for the nodes in the database and does not teach, suggest or disclose storing a path for the node.

2.   Claims 13, 37, 45, and 46 recite sufficiently the same limitations as claim 1, and therefore, are patentable over Lal.

3.   Claims 2-12, 14-21, and 38 are rejected and depend on independent claims 1, 13. 37,45, and 46, and therefore, are patentable over Lal.

Claims 22, 47 and 48

Claim 22, 47, and 48 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,832,219 issued to Lal et al. (Lal).

For claim 22, there are one or more claimed limitations that are not disclosed, taught or suggested by the cited references. Claim 22 recites the following limitations:

generating a SQL query against the computer-implemented structure; and

producing a result set based upon executing the SQL query, wherein the path for a node in the computer implemented structure is accessed during execution of the SQL query.

1.   Amended claim 22 recites "producing a result set based upon executing the SQL query, wherein the path for a node in the computer implemented structure is accessed during execution of the SQL query." According to the Office Action, column 3, lines 40-61, column 4, lines 10-36, ·

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column 7, lines 57-67, column 8, lines 1-48, and column 11, lines 23-38 of Lal allegedly disclose producing a result set based upon executing the SQL query. Applicants respectfully submit that Lal does not teach or suggest producing a result set based upon executing the SQL query, wherein the path for a node in the computer implemented structure is accessed during execution of the SQL query.

As discussed above, Lal is directed toward storing data from an Extensible Markup Language (XML) document in a relational database according to the markup type. (Lal, Abstract and col. 4, lines10-25). Lal discloses parsing an XML document and storing the data into a set of markup tables, one markup table for each type. (Lal, col. 4, lines 10-25). Lal specifically teaches the storage in the database for each node including storage of the id of the parent node, the id of the node being stored, the element name and the value represented by the node in the markup table for the node type. (Lal, col. 6, lines 11-25). Lal specifically provides storage plan for the nodes in the database and does not teach, suggest or disclose storing a path for the node. Thus, Lal does not teach or suggest producing a result set based upon executing the SQL query, wherein the path for a node in the computer implemented structure is accessed during execution of the SQL query.

2.   Claims 47 and 48 recite sufficiently the same limitations as claim 22, and therefore, are patentable over Lal.

3.   Claims 23-34 are rejected and depend on independent claims 22 and therefore, are patentable over Lal.

Claims 35, 36, 49 and 50

Claim 35, 36, 49, and 50 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S.

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Patent No. 6,832,219 issued to Lal et al. (Lal).

For claim 35, there are one or more claimed limitations that are not disclosed, taught or suggested by the cited references. Claim 35 recites the following limitations:

storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema, wherein the storage structure comprises a path for a node within the unstructured document;

determining whether to create an index upon the storage structure, wherein one or more indexes are maintained if desired; and

accessing the unstructured documents by accessing the storage structure.

1.   Amended claim 35 recites "storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema, wherein the storage structure comprises a path for a node within the unstructured document." According to the Office Action, column 3, lines 40-67, column 4, lines 1-36, column 7, lines 57-67, column 8, lines 1-48, and column 11, lines 23-38 of Lal allegedly disclose storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema. Applicants respectfully submit that Lal does not teach or suggest storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema, wherein the storage structure comprises a path for a node within the unstructured document.

As discussed above, Lal is directed toward storing data from an Extensible Markup Language (XML) document in a relational database according to the markup type. (Lal, Abstract and col. 4, lines10-25). Lal discloses parsing an XML document and storing the data into a set of markup

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tables, one markup table for each type. (Lal, col. 4, lines 10-25). Lal specifically teaches the storage in the database for each node including storage of the id of the parent node, the id of the node being stored, the element name and the value represented by the node in the markup table for the node type. (Lal, col. 6, lines 11-25). Lal specifically provides storage plan for the nodes in the database and does not teach, suggest or disclose storing a path for the node. Thus, that Lal does not teach or suggest storing the unstructured document in a storage structure in the relational database system, the storage structure corresponding to a universal schema, wherein the storage structure comprises a path for a node within the unstructured document.

2.   Claims 36, 49, and 50 recite sufficiently the same limitations as claim 35, and therefore, are patentable over Lal.

3.   Claims 36-44 are rejected and depend on independent claims 35, 49, and 50, and therefore, are patentable over Lal.
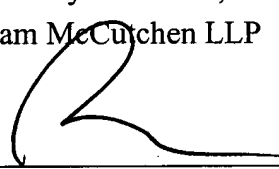
CONCLUSION

Based on the foregoing, all remaining claims are believed in condition for allowance. If the Examiner has any questions or comments regarding the remarks, please contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-2518,** referencing billing number **OI7035852001**. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-2518,** referencing billing number **OI7035852001**.

Respectfully submitted,
Bingham McCutchen LLP

Dated: <u>December 7, 2006</u>   By: _____

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